



December 10, 2024

Via ECF

The Honorable Lorna G. Schofield
United States District Court Southern District of New York
500 Pearl Street, Room 1950
New York, NY 10007

Re: Volino, et. al. v. Progressive Casualty Ins. Co., et al., No. 1:21-cv-06243-LGS

Judge Schofield:

Plaintiffs file this unopposed letter-motion to clarify and/or amend a deadline in the Court's Order entered on November 20, 2024, granting Plaintiffs' application to change the Court-approved Notice Plan (the "Order"). *See* ECF No. 391. In Plaintiffs' application, they requested that, to be consistent with their initial notice, the deadline to opt-out from or object to the settlement ("Objection Deadline") shall be 45 calendar days from the date corrected settlement notices are sent out to Settlement Class Members. *See* ECF No. 390.

In the Order, the Court required that corrected settlement notices be sent out by December 18, 2024. *See* ECF No. 391. The Court also ordered that the Objection Deadline shall be January 6, 2025; however, 45 days from December 18, 2024 is February 1, 2025. Accordingly, to remain consistent with Plaintiffs' initial Notice Plan, Plaintiffs respectfully request that the Court enter an order that (1) the deadline to opt-out from or object to the settlement is February 1, 2025, and (2) any responses to the objections shall be filed by February 19, 2025.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Hank Bates", with a stylized flourish at the end.

Hank Bates

cc. All Counsel of Record via ECF